

CLOSURE PLAN



SEMS DocID 621069

I. Purpose

This plan is written to comply with the Resource Conservation Recovery Act (RCRA) Requirements for closure of a hazardous waste facility. Specifically, it is written to comply with Part 265, subpart G, paragraphs 265.110 - 265.115 as listed in the Federal Register, Volume 45, No. 98, dated May 1980 (as amended).

II. Description of Facility

The facility consists of a Hazardous Waste Storage area having containers (55 gallon drums) which hold the hazardous wastes generated on site. It is estimated that the maximum number of containers in storage at any one time will be ten barrels (55 gallon drums) of waste materials. In addition, an incinerator for processing fumes in one operation and a scrubber for treating effluents in another operation are present.

III. Closure Procedures

- A) Partial closure - the facility will not be partially closed.
- B) Final closure - the facility will only be closed whenever the Corporation terminates operations at the present location and/or terminates manufacturing procedures which generate waste material deemed to be hazardous. The final closure procedure will be in accordance with the following schedule (see Attachment A).
 - (1) Fiber Materials, Inc., will submit its Closure Plan to the Environmental Protection Agency Regional Administrator at least 180 days before it expects to begin closure proceedings.
 - (2) Upon approval by the Regional Administrator of FMI's Closure Plan, wastes will no longer be accepted for storage. (All waste generation activities will cease 90 days prior to implementing the Closure Plan).
 - (3) Ninety days from the date proceedings are begun, all closure proceedings will be completed.
- C) Closure proceedings will consist of the following actions:
 - (1) Storage Facility
 - (a) Removal of all containers to approved disposal facilities. (To be completed within 90 days after closure proceedings have begun).
 - (b) Decontamination of equipment - all equipment used in the handling and storage of hazardous waste will be decontaminated using approved solvents/chemicals (see Attachment B for specific areas and proper solvents/chemicals to be used).

- III. C) (1) (b) The cleaning material will be placed in approved containers for proper disposal to be completed within 90 days after closure proceedings begin should rinsing operations be necessary.
- (c) All personal protective equipment (gloves, aprons, boots, etc.), will be placed in a container for proper disposal after all decontamination/removal action is complete (within 5 days after decontamination is complete, the container will be removed to a proper disposal facility.)
- (2) Incinerator
- (a) All residue/waste will be removed from the incinerator if present.
- (b) All residue will be placed in containers (55 gallon drums) and properly disposed. See Closure Plan proceedings under Storage Facility listed above.
- (c) Removal of residue/waste and decontamination will be completed within 60 days as of beginning of closure proceedings.
- (3) Scrubber
- (a) All residue/waste will be removed from the scrubber and equipment if present.
- (b) All residue/waste will be placed in containers (55 gallon drums) and properly disposed. See the Closure Plan proceedings under Storage Facility listed above.
- (c) Removal of residue/waste and decontamination will be completed within 60 days of beginning of closure proceedings.

IV. Amendments

Amendments to this plan will be made whenever changes in operation or facility design affect the Closure Plan.

V. Financial Requirements

See Attachment C for costs associated with closure of the facility.

VI. Certification of Closure

A Certification of Closure signed by the Corporation and an independent registered professional engineer will be submitted to the Regional Administrator upon completion of the closure proceedings.

ATTACHMENT A

CLOSURE PLAN SCHEDULE

<u>Day</u>	<u>0</u>	<u>30</u>	<u>60</u>	<u>90</u>	<u>120</u>	<u>150</u>	<u>180</u>
Decision made to close facility	X						
Closure plan sent to Regional Administrator for approval	X						
Approval received from EPA				X			
Cease generation of hazardous waste				X			
Begin Closure Proceedings				X			
Decontamination begun				X			
Decontamination finished						X	
Begin removal of cont- ainers to disposal site						X	
Complete removal of cont- ainers to disposal site							X
Closure proceedings completed							X

ATTACHMENT B

SPECIFIC AREAS TO BE CLEANED/DECONTAMINATED

I. Storage Facility

Walls
Floors
Fork lift
Pallet jack

II. Incinerator

Carbonizer
Pipes
Internal chamber of incinerator
Incinerator stack

III. Scrubber

Exhaust duct to scrubber
Scrubber stack
Internal chamber of scrubber
Floor around scrubber

IV. General

(1) Rod cleaning area Building one

Tank
Pump/hose
Holding bucket
Floor

(2) Cleaning/decontamination equipment

Gloves
Boots
Hoods
Jackets
Mop
Clothes
Buckets

ATTACHMENT C

FINANCIAL REQUIREMENTS

It is anticipated that the financial requirements for closure of the storage facility will be approximately \$2084. This figure is based on the following cost breakdown as it relates to the storage building.

- 1) Clean-up of residue inside/outside building

2 men x 8 hours each x 2 days =
32 hours @ \$12.00/hour = \$ 384

- 2) Removal of drums (10 at \$150/drum) 1500

- 3) Engineer Certification 200

Total: \$2084